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Honorable Yvonne Gonzalez Rogers
United States District Judge
U.S. District Court – Northern District of California
Oakland Courthouse, Courtroom 1 – 4th Floor
1301 Clay Street,
Oakland, CA 94612

Re: IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION (MDL NO. 3047)
Application of Paige Boldt for Leadership Position

Dear Judge Gonzalez Rogers,

I respectfully submit this application to be appointed to the Plaintiffs' Steering Committee ("PSC") pursuant to your Order Setting Initial Conference. I have attached my current resume (*Attachment 1*) along with names of other counsel invested in this litigation who support my application, and whose applications I likewise support (*Attachment 2*).

I am a partner of the law firm of Watts Guerra LLP where my practice, for the last ten years, has been devoted to mass tort product liability litigation in both state and federal courts. I believe that I meet this Court's criteria for individual membership in the Plaintiff's Steering Committee ("PSC") in that, I have extensive experience working collaboratively with my colleagues in dozens of product liability MDLs and have the time and availability to dedicate to this matter. Additionally, I am part of a narrow subset of lawyers who both *personally* recall waiting with anticipation to receive the college email address required for their first Facebook account and *now* have a teenager of my own, providing a front-row seat to the generations most susceptible to the dangers that will be litigated in this Court. I have a unique understanding of the overarching importance of this case, as both a lawyer and a parent.

A. WILLINGNESS AND AVAILABILITY TO COMMIT TO TIME-CONSUMING PROJECT

In the last three year, the majority of the mass torts litigations involving my clients have settled or will settle imminently, specifically Xarelto (MDL 2952), Pinnacle Hip (MDL 2244), California PG&E fire claims, and Transvaginal Mesh litigations (MDL 2327, MDL 2326, MDL 2187). As such, I have the immediate ability to commit to this time-consuming litigation. I currently serve on the Zantac (Ranitidine) MDL (MDL 2924) Plaintiff Steering Committee, and more specifically, the Deposition and Bellwether subcommittees. While I do anticipate supporting the Zantac trial team next year as needed, I can assure this Court that I have the capacity to take on a second leadership project that will immediately require significant time and attention.

Further, we will represent many injured Plaintiffs in this case and be willing to lend resources for the common benefit of all plaintiffs. Due to the fees earned from recent mass tort settlements, a \$100 million revolving credit facility, and a large staff of lawyers and support personnel our firm has

access to the resources needed to prosecute this litigation in a timely manner and intend to access our resources to do so in this Court. All of the Plaintiffs in this litigation, and their families, deserve efficient and effective representation and I have the willingness and availability to do so.

B. PROFESSIONAL EXPERIENCE IN THIS TYPE OF LITIGATION

Since 2012, I have focused on representing thousands of clients in numerous pharmaceutical and medical device cases in state and federal MDLs. This has provided exposure to a large number of mass torts quickly and witnessing firsthand how poorly managed MDLs can lag and seeing how tailored, specific court orders affect our clients lives and promote efficient resolution for their cases. I am currently serving on the PSC in the Zantac litigation and am working with diligence and intentionality to serve those Plaintiffs affected by cancer. I believe that many of the data-driven decisions and innovations made in that MDL would apply and assist in this litigation as well. I specifically assist leadership of the Bellwether Committee, where we are leveraging the Census data made available to the court and both parties to prepare a statistically significant pool of cases to lead our trials. This same census data has provided the parties an avenue to communicate about the direction of the litigation and better exchange Defendant's proprietary data about each Plaintiff which will undoubtedly be an early consideration in this litigation. I have additionally assisted both the Zantac and Valsartan MDL Science Committees in pursuing and preparing experts in many fields of study.

Prior to serving on a MDL Plaintiff's Steering Committee, I am very familiar with the practical consequences of MDL leadership decisions and have represented clients in bellwether discovery as well as wave discovery orders. This required hundreds of pages of written discovery and taking dozens case-specific causation expert and treating physician depositions in Accutane (MDL 1626) and Transvaginal Mesh litigations (MDL 2327, MDL 2326, MDL 2187). Additionally, I was selected to work on several projects in the Valsartan MDL (MDL 2875) ranging from ESI, discovery, bellwether protocol, and diving into the nitrosamine science in that litigation. Further specific examples of common benefit work and leadership experience along with the contact information for the Judges presiding over those litigations are provided below.

Product Liability MDL	Judge/Telephone	Nature of common benefit work / extent of ongoing time commitment
MDL 2924 Zantac (Ranitidine)	Hon. Robin Rosenberg (SDFL) (561) 803-3430	<ul style="list-style-type: none"> - Inaugural Member of Leadership Development Committee; Promoted in May 2022 to Plaintiff Steering Committee and specifically assigned to Bellwether, Science, and Deposition projects. - Serves as liaison between Defendants and Bellwether counsel for 272 potential bellwethers, as we resolve issues and cooperatively work up and determine a statistically significant pool of trial-ready cases. - Working with science team to identify early notice documents and evidence for our general causation experts in addition to engaging and preparing specific causation experts for deposition. - Managing teams on Deposition committee projects, personally preparing for dozens of 30(b)(6) depositions, expert cross examination, and coordinating the cutting thousands of hours of deposition testimony into a trial-ready package.

MDL 2875 Valsartan	Hon. Robert Kugler (D. NJ) (856) 757-5019	<ul style="list-style-type: none"> - Assisting with Personal Injury Bellwether Committee and Discovery Committee projects. - Part of three lawyer team developing complex rubric to evaluate personal injury cases for bellwether selection, educating personal injury attorneys on case criteria, and assisting with future resolution of the litigation. - Working on discovery committee project for reviewing defendant's production for general completeness and specifically FDA inspection documents. - Pending Case, Court has prioritized the Class Claims over the personal injury claims in trial scheduling.
MDL 2327 Ethicon MDL 2326 Boston Scientific MDL 2187 C.R. Bard Pelvic Repair Systems	Hon. Joseph R. Goodwin (WVSD) (304) 347-3192	<ul style="list-style-type: none"> - Worked up potential bellwethers and managed 187 cases set for wave discovery deadlines, including written discovery and case specific causation expert, physicians, and plaintiff depositions. MDL litigation resolved.
MDL 2591 Syngenta Corn	Hon. John Lungstrum (D. KS) (913) 735-2320	<ul style="list-style-type: none"> - Assisting Bellwether team working on individual cases, personally assisted with specific client discover and depositions. MDL Litigation resolved.
MDL 2782 Physiomesh Hernia Mesh	Hon. Richard W. Story (NDGA) (404) 215-1349	<ul style="list-style-type: none"> - Member of the Discovery and Document Review Team. Identified and reviewed thousands of produced documents. Participation resolved.

C. ABILITY TO WORK COOPERATIVELY WITH OTHERS

Mass tort litigations are strongest when efficiency, cooperation, and communication is an early goal, I have spoken to, and am familiar with, the leaders of this litigation, and have enjoyed working with many of them in other mass tort litigations and will continue to work cooperatively with them. I have no doubt that I will continue to work cooperatively and collaboratively with my colleagues if appointed and would be honored to serve as a member of this Court's Plaintiffs' Steering Committee.

Respectfully submitted,



Paige Boldt
WATTS GUERRA LLP